January

State
Coordinator
Self-Assessment

EVEN START

January

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Part I
Introduction

INTRODUCTION:

Federal Monitoring Plan

Each State Educational Agency (SEA), as a condition of receiving funds under Title I, Part B, of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB) of 2001, provided an assurance to the U.S. Department of Education (ED) that it would administer the Even Start program in accordance with all applicable statutory and regulatory requirements. Federal monitoring ensures that these assurances are being carried out.

The Academic Improvement and Teacher Quality Programs (AITQ) office's monitoring plan consists of four major components that help SEAs build capacity to improve student achievement and ensure program compliance:

- **State Data Review** ED reviews data from the Consolidated State Performance Report (CSPR) and past monitoring reports as part of the process for determining which SEAs will be asked to complete a self-assessment and which SEAs will receive desk audits and/or site visits in any one year.

- **Self-Assessment** The purpose of the self-assessment is to help SEAs identify their own concerns; consider new strategies to meet Even Start program requirements; and/or prepare for an upcoming desk and on-site monitoring review**.**

- **Desk Review** In completing a desk review, ED will first ask an SEA to submit information related to the monitoring indicators. Following a review of the materials, ED will conduct a conference call to work with the SEA to identify issues and questions and to determine compliance with each monitoring indicator.

- **On-Site Monitoring** Each year ED will select SEAs for a formal site visit. During the on-site monitoring visit, ED will review SEA records, meet with SEA staff and visit local Even Start programs. Following a site visit, SEAs will receive a written report detailing recommendations and findings.

Every year, AITQ will complete a review of SEA's data to identify which SEAs will participate in the self-assessment, desk, and/or on-site monitoring review. At some point during ED's two year monitoring cycle, each SEA will complete a self-assessment report, and/or receive a desk review or on-site monitoring visit. In addition, monitoring outside of the scheduled cycle may be arranged as needed if a State has serious or chronic compliance problems or has unresolved issues identified during either the desk review or the monitoring process.

About this document

The **Even Start State Coordinator Self-Assessment Guide** is a checklist that includes items from each section of the Federal monitoring tool (Standards, Assessment and Accountability; Program Improvement; and Fiduciary). The purpose of the self-assessment is to help SEAs identify strengths and areas for improvement. It can be used as a stand-

alone document for states conducting a self-assessment only or it can by used by states receiving a desk review or site visit as a means of preparing for those forms of Federal monitoring.

ED staff will use this self-assessment checklist to better understand the procedures the State has implemented to meet requirements and to manage the Even Start program since the last time the SEA was monitored. This document is also intended to assist SEAs in preparing for monitoring reviews by describing the scope of the information that the U.S. Department of Education expects to review and analyze.

State coordinators have the option of completing this self-assessment on their own or convening a team of other state and/or local practitioners familiar with the implementation of Even Start in their state to jointly complete the self-assessment.

The self-assessment checklist (pages 6-9) is divided into two major sections: 1) Standards, Assessment and Accountability and Program Support indicators and 2) Fiduciary indicators. Within each subsection there are possible sources of evidence (examples of documentation states should review) and guiding questions for SEAs to consider as they complete the self-assessment. Both the sources of evidence and guiding questions correspond to items on the Federal monitoring tool.

Within each category at the top right of the section, there is a rating scale. After reviewing documents and considering the guiding questions, SEA coordinators and/or SEA team should rate the overall quality of implementation for this subsection using the following as a guide:

- **Circle 1** if the SEA has many concerns about the quality of implementation and feels extended outside technical assistance is needed in a subcategory to make needed improvements. For example, forms and/or systems are not in place and need to be developed from scratch.

- **Circle 2** if implementation is somewhat adequate and some outside technical assistance is needed on a limited basis to make needed changes to improve implementation. For example, forms and/or systems are partially in place but need to be updated and improved.

- **Circle 3** if implementation is adequate but could be improved; no outside technical assistance is necessary. The SEA feels improvements can be made internally.

- **Circle 4** if systems are well implemented and provide the SEA with sufficient information to manage Even Start and/or make informed decisions about the quality of Even Start services at the SEA or local level.

Once you have completed the checklist, complete the State Coordinator Self-assessment Summary:

- Pages 10 and 11 ask SEAs to summarize their score for each of the 14 subcategories and identify what is in place and working for each subcategory (strengths) and areas that need more development, especially if the score for a subcategory is either a 1 or 2.

- Page 12 of the self-assessment asks SEAs to prioritize areas for more development and/or improvement and more importantly, identify areas where they need more technical assistance from ED.

- Expand comment boxes as necessary, save a copy and send an electronic copy to ED.

Next Steps

If an SEA is completing this self-assessment in preparation for a desk or on-site monitoring visit, the self-assessment forms need not be sent to ED. SEAs are encouraged to begin addressing areas that need more development and/or improvement in preparation for their scheduled desk or site visit.

If an SEA is completing this self-assessment as a stand-alone document for monitoring (i.e., there is no scheduled desk or site visit scheduled) SEAs will be asked to submit the checklist rating scales and summary sheets to ED for review. The purpose of this review is to identify areas where SEAs may need and/or request more technical assistance and/or support from ED. ED will work with individual SEAs to implement a technical assistance plan as needed.

Part II
Self-assessment
Tool

Standards, Assessment and Accountability; Program Support

Subgranting funds is an opportunity for a State Even Start coordinator to convey the vision of Even Start to applicants and/or continuing programs and to set high expectations for quality implementation of literacy services.

Subgrant Award Requirements

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Documentation of recent competition, RFP (request for proposal) or application package; selection criteria and priorities; review panel composition; copies of applications; memorandum or meeting minutes from Committee of Practitioners (COP); documentation of state rules, written policies and/or guidance; copies of feedback given to applicants; copies of advertising and/or announcements about latest competition

Guiding Questions

Does my current RFP or RFA meet requirements under NCLB and the ES statute?

Am I getting quality applications using my current RFP and selection criteria process or does the process need to be improved?

Has the Committee of Practitioners reviewed any changes to the RFP/RFA and/or selection criteria?

How am I ensuring that new competitions are held at least every four years (if funds are available)? Are these competitions open to all eligible projects?

Continuation Subgrants

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Review form or protocol for making continuation awards; names of programs determined to be making insufficient progress and rationale for this justification; evidence of TA provided to projects not making sufficient progress; record of hearings; program participation data families

Guiding Questions

Does my current continuation subgrant process give me sufficient information to determine if a program is meeting the statutory requirements, the goals and objectives in their approved application AND the extent to which they are making sufficient progress?

Do I have a clear, understandable definition of sufficient progress? Do projects understand what making sufficient progress means?

Local Evaluations

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Sample local evaluation; training or guidance provided to programs on effective local evaluation; written feedback to programs concerning local evaluation

Guiding Questions

To what extent do local evaluations provide recommendations used for program improvement?

How do projects use the information from their evaluations? Am I able to use information from local evaluations in making decisions about continuation awards?

To what extent do local evaluations need to be improved? How?

Standards, Assessment and Accountability; Program Support

Monitoring is an opportunity to flag possible programmatic and legal concerns, explore project data in comparison to statewide data and to assist program improvement efforts. The annual monitoring of subgrants can be done through document reviews, desk audits or site reviews. A monitoring process should be systematic, fair, focused, efficient and timely.

State Monitoring Plan

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Copies of the state monitoring protocols, evidence that state performance indicators are included in monitoring; notice to programs regarding monitoring, timelines, monitoring schedules

Guiding Questions

Does the current monitoring process result in the information I need to determine if programs are in material compliance **and** meeting the goals and objectives in their approved application?

To what extent are programs aware of the monitoring process, including expectations, schedule and timelines?

Am I keeping sufficient documentation on monitoring?

Use of Monitoring Findings

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Copies of monitoring reports; copies of program responses to monitoring findings; evidence of technical assistance efforts for high needs programs

Guiding Questions

Are there common issues across programs that are emerging from monitoring?

How do I follow up on the monitoring? How do I determine whether findings are resolved, or whether additional TA is needed?

To what extent is the state funded TA tied to monitoring findings?

Program Compliance

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Copies of approved applications and any modifications; copies of compliance documents; end-of-year reports and/or review forms; copies of monitoring reports; copies of program responses to findings

Guiding Questions

Are programs complying with their approved application and other requirements? Are they held accountable for families participating in all four components? Are they serving eligible, most-in-need families? Are staff meeting qualifications?

Standards, Assessment and Accountability; Program Support

Accountability systems provides an opportunity for SEA coordinators to define standards of quality, systematically collect data to determine training and TA needs, hold programs accountable for quality and improve program outcomes for adults and children.

State Performance Indicators

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Copies of state performance indicators; memorandum and/or COP meeting minutes approving revisions to indicators; program level data on performance indicators; evidence that the RFP or RFA and monitoring protocols incorporate state performance indicators

Guiding Questions

To what extent are state performance indicators used to monitor programs and make funding decisions?

Do the performance indicators need to be revised to set realistic but challenging performance targets based on state data? To incorporate GPRA measures? To align them more closely with state adult education or other programs? To improve program quality?

State Data Collection Systems

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

State data collection forms; copies of requirements for data collection; documentation of technical assistance and/or guidance given to local programs on data collection

Guiding Questions

Does the current data collection system result in sufficient, reliable, and usable data on performance indicators? On data needed for the CSPR report?

Definition of Sufficient Progress

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

State definition and/or protocol for defining sufficient progress; lists of projects making insufficient progress and the rational for this determination; evidence the definition of sufficient progress is used in making continuation awards

Guiding Questions

To what extent does the current definition of sufficient progress include the use of data from monitoring, local evaluations and performance indicator results?

Are there clearly defined consequences for programs not making sufficient progress?

SEA Technical Assistance (TA)

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Records of subgrant, contract, or cooperative agreement; record of allocation of funds for TA; description and summary of TA efforts

Guiding Questions

How are State Even Start funds being used for TA?

Do I have a clear understanding of the specific training needs of local Even Start programs?

Hearing Procedures

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Records of corrective actions; hearing procedures; hearing records for discontinued programs

Guiding Questions

Am I keeping sufficient documentation on high risk grantees?

To what extent have I explained Federal and State hearing procedures to programs?

Fiduciary

Reviewing program budgets and expenditures provides an opportunity for coordinators to ensure that Even Start dollars are used in accordance with the statute and are expended wisely.

State Administration

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Records for state administration and technical assistance; records of subgrant amounts; copies of TA contracts, subgrants and/or cooperative agreements; written allocation procedures; records of any reallocation and carryover activity

Guiding Questions

How is the use of state administration funds determined?

Are state administration funds being used in accordance with the statute?

How does the state's financial office provide oversight and ensure compliance with program requirements?

Ensuring Subgrantee Compliance with Use of Funds

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Guidance to projects on uses of matching funds; records of subgrant amounts, funded year of each subgrant and total annual match contribution; conflict of interest policies; reports from local projects on expenditures and local match

Guiding Questions

To what extent does the information and guidance currently provided to programs ensure that they are meeting matching requirements?

Are there clear consequences in place for programs that do not meet their required match?

How does the state ensure that projects are not using funds for unallowable costs (e.g. indirect costs, construction) or for other programs or services?

Maintenance of Effort

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

Maintenance of effort (MOE) report comparing fiscal effort per student for eligible entity LEA-partners in preceding year to second preceding year; evidence of reduction in subgrant award for any LEA that failed to maintain effort, or copy of waiver from SEA

Guiding Questions

Do you know if any Even Start LEA partners are out of compliance? Do you know what efforts were made if they were not in compliance?

Equitable Participation

Implementation Progress			
1	2	3	4

Possible Sources of Evidence

SEA procedures and policies for providing services to Even Start eligible elementary and secondary children attending private schools; guidance to Even Start grantees; SEA compliance procedures for private schools

Guiding Questions

Do SEA and LEA staff understand the allocation of funds for eligible private school children?

To what extent is the consultation regarding equitable services clear in SEA policies and procedures?

State Coordinator Self-assessment Summary

	Score	What's in Place and Working?	Areas to Develop
Subgrant Award Requirements	4	March 2009 Grant Application, RFP, and Bidder's Conference met requirements under NCLB and ES statute. The Even Start Web site can be found at www.opi.mt.gov, Programs Tab, Title Programs, Title I Programs, click on Even Start. The Even Start RFP, Application, and Bidder's Conference is also on this Web site. The Bidder's Conference Announcement was sent to all School Districts, Head Start Programs, State Libraries, Adult Basic Programs, and Housing Authorities in Montana. The Montana Office of Public Instruction (OPI) received three quality applications July 2009; all were approved by three review panelists (past ES Program Directors who have training in all four components). The MT Even Start Consortium did not review the 2009 Request for Proposals (RFP) and Selection Criteria because no changes were made from the previous grant cycle. The OPI has not received an increase in ES Federal Funds so new competitions are not held unless a Program is at the end of a four-year funding cycle. If the OPI is forced to decrease or eliminate a Program because of a reduction in Federal Funding Policy #3 (on Web site, under General Information) is used. MT Even Start Policy #1 (General Information) is used by the Review Panel to select applications. After the Review Panel selects a new applicant for funding, an on-site visit is conducted by the ES Director and Evaluator to assure the proposed Program can meet the statutory requirements. New competitions are held every four years if Even Start Funds are available. See Policy #3 (under General Information) for process.	

Continuation Subgrants	4	The MT ES Director reviews the progress toward the Goals and Objectives as stated in each Program's Application and the MT Performance Indicators to determine if Programs are meeting the statutory requirements (through desk monitoring, using the Quality Rating Rubric as a guide). In the fall of each year all staff members from each of the three Programs meet with the State Director and Program Evaluator to review progress toward meeting the past year's program Performance Indicators and to make a plan for program improvement for the next year (data-based decision making). Policy #2 on the Even Start Web site (under General Information) outlines the definition of Sufficient Progress.	
Local Evaluations	4	The State Director and State Evaluator review the Performance Indicator results for each program at the end of July. If any Programs are in need of improvement after the Performance Indicator review, the State Policy #2 (ES Web Site) (Under General Information) is implemented. These policies were developed and reviewed by the MT ES Consortium. MT has not had to use this Policy. The funding approval letters notify the programs of the status of program improvement and what changes need to be made to their applications. The letters are sent to Program Directors and Authorized Representatives. The State Director and the State Evaluator review the new Performance Indicator results in the fall with all staff members from each of the three Programs, using a "Data-based decision making" Evaluation Worksheet. At the meeting, Program staff review the census information and pick the top three indicators that they meet and the top three that they did not meet; each Program then completes a "logic model" to detail, in writing, as to how they are going to improve the indicators as a program team. The State Coordinator and State Evaluator are provided with copies to	

		file and to use the completed worksheets for program monitoring and evaluation. In addition, new grantees are required to modify their application if there are missing items before awards are given.	
State Monitoring Plan	4	The State uses the following Instruments to determine if programs are in material compliance and meeting the goals and objectives of the approved application: Performance Indicator Census Information, Guide to Quality Rating Instrument for on-site reviews, Use of Data Worksheet, and the Guide to Quality Desk Top Review. The Programs are aware of the monitoring process, including expectations, schedule and timelines in the fall of each year. Monitoring results are placed in each program's folder at the OPI along with other important documents.	
Use of Monitoring Findings	4	The State has a Policy #2 (under General Information), which details the steps taken when programs don't meet the state indicators, material compliance, and goals and objectives of the approved application. MT has never had to use this policy. The State provides technical assistance to programs each fall and addresses any findings with each program. Programs also list the resources and/or technical assistance they may need on the Use of Data Worksheet they complete each fall. The Use of Data Worksheet also provides OPI with common issues across the programs.	
Program Compliance	4	Each year, Program Assurances are signed by each Programs' Authorized Representative complying in writing with their approved application, serving most in need families, assuring families are participating in all four components and meeting staff qualifications. Copies of the approved application and any application modifications; compliance documents; use of data	

		worksheet (Program Indicators); copies on approval letters with findings and monitoring results are filed for each program at the OPI. The State Director uses these in the day-to-day operation of Even Start.	
State Performance Indicators	4	The Montana Even Start Family Literacy Program Performance Indicators were developed by a committee comprised of the State Director, State Evaluator, and Program Directors. The Performance Indicators were Federally approved in June 2001.	
State Data Collection Systems	4	All Montana Even Start Programs are required to meet the MT Performance Indicators. Individual Programs may adopt additional Indicators specific to the Program. State Performance Indicator Data is collected electronically through a state-developed custom software program twice annually, at mid year—from July 1-December 31 (formative assessment), and at the end of year-July 1-June 30 (summative assessment).	

State Coordinator Self-asessment Summary

	Score	What's in Place and Working?	Areas to Develop
Definition of Sufficient Progress	4	Communication systems (regularly scheduled face to face and conference call meetings), are in place to assure Programs understand Program and Performance Indicator expectations to assure participant success. Each Program is expected to attain at least six GED/High School Diplomas per year, and an average participant attendance rate of 70 percent.	
SEA Technical Assistance	**4**	The Program Director and State Evaluator meet with Even Start program directors and staff in the fall to review indicators and programs. The program turns in a plan for improvement. At this meeting the OPI has an outside consultant train on the various programs within the state. Local Programs set-aside 5 percent of grant monies for professional development and another 5 percent for travel. All local directors and a majority of the staff have training NCFL "Foundations In Family Literacy." MT is one of the smaller states that receives a small allocation for administration and program evaluation, so beyond what the state ES can provide, the OPI relies on our state partners to provide professional development as well as technical assistance. If, in the future, Montana receives additional administration funds, the state will keep records of all sub grants, contracts, or cooperative agreements, records of allocation of funds for TA; descriptions and summary of TA efforts. These records were kept several years ago when Montana had more administrative funds.	
Hearing Procedures	**5**	The OPI has a State and Federal Grants Handbook which outlines corrective actions and the hearing procedures. The Even Start program has not been through a hearings process so there are no discontinued programs.	

| State Administration | 4 | The OPI set-aside for Administration of the Program is 3 percent and the set-aside of program evaluation is 3 percent of the total MT Federal Allocation as in accordance with the statute.

The MT OPI School Finance Division provides oversight and ensures compliance with program requirements. Written allocation procedures, records of any reallocation and carryover activities are kept in this department. Records of the sub grant amounts with the State Evaluator and software expenditures are also kept in this division.

The state does not have additional funding to support TA contracts, sub grants and/or cooperative agreements, after support funding of a quarter-time director, evaluator and evaluation system.

The MT OPI has a Letter of Agreement with the software program manager and consultant records used for the state evaluator. | |
| **Ensuring Subgrantee Compliance with Use of Funds** | 4 | A detailed budget is sent with new and continued grant applications each year detailing the local budget and the federal budget. This budget is sent to the OPI ES Accountant in the School Finance Division. The State Director takes the budgets and visits with the local program director and program accountant on-site. Most program's federal budgets include in-kind teachers, free building rent and professional development.

New and Continued Applications has "Indirect Costs are Not Allowed" in several places throughout the application.

The new and continuation applications have a definition in the Budget Description Section--under Lease/Rent and Building Fees, and the budget on the Rental/Lease Costs Summary Guidance (on calculating rent/building fees) to ensure that programs calculate these charges according to the Guidance received from the Education Department August 2007. This guidance has also been added to | |

		the Even Start Web site.	
Maintenance of Effort	4	The OPI, School Finance Division, collects the MOE Information. The written report is then distributed to all Title I Program directors. At that time, the OPI will determine if there is a school district/LEA Partner in the list receiving Even Start funds. Even Start has never had a district out of compliance.	
Equitable Participation	4	The common assurance for federal programs including Even Start non-profits are signed and stored in the Office of Public Instruction E-Grant System. The assurances include eligible private school children as well as home school families. In addition, districts share the program sign-off with Even Start Coordinators in the fall of each year. At the All-Staff meeting, the state director went over a formal consultation process to determine if the private school would like to participate in the community's Even Start program. The consultation process includes a written letter to private schools requesting a visit, an agenda of meeting, and any follow-up items will be sent in a written response. Copies of letters are sent to state directors in the local program's desk-top review and asked for on-site reviews. The SEA Title I compliance procedures are clear for those districts receiving Title I services.	

State Coordinator Self-assessment Summary

Based on the self-assessment checklist, identify the top priority areas to develop.

Based on the self-assessment checklist, the top priority areas to develop include alternative means of communication with Program Staff to assure integrity. Because of reduced Even Start travel budgets, the State Director and the State Evaluator are not able to visit each Program with the same degree of frequency. Therefore, the State Director will explore costs associated with various means of telecommunications (such as conference calling, email, webinars) for the purpose of regular meetings/technical assistance with and among the Program Directors.

What general strategies are needed to address the listed priorities?

Research associated costs for each telecommunication method, select a method, and coordinate meeting schedules.

What general challenges do you anticipate that might require additional TA?

None.